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**Lead Safe Weatherization (LSW)
Renovation, Repair & Painting (RRP) Rule
Compliance Report
FORM CSD 708**

***IMPORTANT:* ANY AND ALL RRP RULE DOCUMENTATION, INCLUDING WITHOUT LIMITATION THIS REPORT, MUST BE MAINTAINED AND AVAILABLE FOR INSPECTION FOR A MINIMUM PERIOD OF THREE (3) YEARS FOLLOWING COMPLETION OF THE WORK. (40 CFR §745.86(a))**

INSTRUCTIONS

Lead Safe Weatherization (LSW) Renovation, Repair & Painting (RRP) Rule Compliance Report Form CSD 708

PLEASE READ: THESE INSTRUCTIONS CONTAIN ADDITIONAL INFORMATION AND NOTIFICATION REQUIREMENTS NOT DESCRIBED IN THE COMPLIANCE REPORT PAGES.

The federal Environmental Protection Agency's (EPA's) Renovation, Repair & Painting Rule (Rule) (40 CFR 745) requires that renovations conducted for compensation, including weatherization measure installation, must be performed by Certified Firms using Certified Renovators. Firms that wish to work in pre-1978 homes and child occupied facilities must apply to EPA and pay a fee in order to become certified. Renovators seeking to become Certified Renovators must successfully complete an EPA-accredited renovator course. Additionally, the federal Department of Energy (DOE) also requires weatherization program workers have separate instruction in lead-safe weatherization training.

The *LSW RRP Rule Compliance Report* (Report) is a tool to assist fulfillment of record keeping and tracking requirements contained in the Rule. While this Introduction and the Report will assist in compliance with the Rule, it is important to remain aware that law and regulations change and, accordingly, a Certified Firm or Certified Renovator must remain abreast of industry trends and regulation.

Following is a description of each "page" included in the Report with suggestions for use. Depending on individual dwelling criteria and circumstances, some of the pages of the Report should be included in every assessment (specifically, the Report Summary, page A), while others may or may not be appropriate. For example, a signed-by-client/occupant Pre-Renovation Form (page B) is not required if the dwelling is exempt from the Rule, and the Renovation Notice (page C) is required only if the work involves common areas of multi-family housing. The examples/descriptions are not exhaustive.

Page A, Summary Report. Used to qualify or disqualify a dwelling for LSW-RRP practices. Depending on circumstances, all or a portion of this form should be filled out. The applicable check boxes, circled "N/A", or written "N/A" (if no clearance required) should be included. A Certified Renovator should sign and date the page irrespective of whether or not LSW-RRP practices were required. The person making determination a dwelling is "exempt" should legibly print and sign as appropriate.

Page B, Pre-Renovation Form. Used to confirm receipt of *The Lead Safe Certified Guide to Renovate Right* pamphlet, or in the case of tenant-occupied dwelling the Certified Renovator's certification of delivery if tenant declined, etc. Since this notice is duplicative of what is included in the CSD 321 (Client Education Confirmation of Receipt), and if (1) the signature is on the CSD 321 and (2) the circled "Y" on page A indicates the client/occupant received the pamphlet, this page would not be optional.

Page C, Renovation Notice. Used for multi-family units weatherization work. Complete as appropriate and described.

Page D, Non-Certified Workers Training Log. Used to show required training received by all workers on the dwelling. Some Skill Sets must be performed by the Certified Renovator (see bottom page D). If a “worker” is also a Certified Renovator but not the Certified Renovator of Record, i.e., the Certified Renovator associated for the particular project, the name of the “worker” Certified Renovator should be legibly written in the “Name of Trainee” space with the notation they have been trained as a Certified Renovator and his or her certification number written in the area adjacent/across the Skill Set line(s). Although this will fulfill the “training” requirement for the “worker”, only the Certified Renovator of Record should perform those tasks and Skill Sets shown to require certification.

Page E, Paint Assessment—Weatherization. Used to identify weatherization activities likely to disturb paint. Complete as described. If lead test kit(s) are used A COPY OF THIS PAGE, CLEARLY SHOWING THE TEST KIT INFORMATION MUST BE PROVIDED THE OWNER AND/OR OCCUPANT within thirty (30) days of completion of the project.

Page F, Lead Test Kit Documentation Form. Complete and attach to Page E as appropriate. If lead test kit(s) are used (see page E, above) A COPY OF THIS PAGE, CLEARLY SHOWING ANY TEST LOCATIONS AND INDICATED TEST RESULTS MUST BE PROVIDED THE OWNER AND/OR OCCUPANT within thirty (30) days of completion of the project.

Page G, Interior Worksite Preparation Checklist. Complete as appropriate and described.
NOTE: Some items should be done by the Certified Renovator of Record for the particular project.

Page H, Exterior Worksite Preparation Checklist. Complete as appropriate and described.
NOTE: Some items should be done by the Certified Renovator of Record for the particular project.

Page I, Cleaning Verification Post Renovation. Complete as appropriate and described. NOTE: Some items should be done by the Certified Renovator of Record for the particular project. If dust clearance sampling was used, A COPY OF THIS THE DUST SAMPLING REPORT MUST BE DELIVERED TO THE OWNER AND/OR OCCUPANT within thirty (30) days of completion of the project.

SPECIAL NOTES:

1. *Although the RRP Rule often uses the wording “person who contracted for the [weatherization work]” instead of “client”, “owner”, or “occupant” (terms often used in weatherization assistance programs), it is reasonable and prudent to include these parties in notifications required by the Rule.*
2. *It is strongly recommended that photographs be taken and included in file for the LSW-RRP practices used during the weatherization project.*
3. **IMPORTANT: ANY AND ALL RRP RULE DOCUMENTATION, INCLUDING WITHOUT LIMITATION THIS REPORT, MUST BE MAINTAINED AND AVAILABLE FOR INSPECTION FOR A MINIMUM PERIOD OF THREE (3) YEARS FOLLOWING COMPLETION OF THE WORK. (40 CFR §745.86(a)).**

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